



February 27, 2009  
VIA ECFS

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Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**2008 CPNI Certification Filing for Leap Frog Telecom, L.L.C. d/b/a Voce Telecom**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Leap Frog Telecom, L.L.C. d/b/a Voce Telecom hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or [stthomas@tminc.com](mailto:stthomas@tminc.com) if you have any questions about this filing.

Sincerely,

Sharon Thomas  
Consultant to  
Leap Frog Telecom, L.L.C. d/b/a Voce Telecom

*ST/im.*  
*Enclosure*

cc: Best Copy and Printing [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
FCC Enforcement Bureau (2 Copies)  
D. Pantzartzis, Leap Frog  
File: Leap Frog - FCC CPNI  
TMS: FCCX0901

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Name of company covered by this certification: **Leap Frog Telecom, L.L.C. d/b/a Voce Telecom**


Form 499 Filer ID: 827489

Name of signatory: Dimitris Pantzartzis

Title of signatory: President

I, Dimitris Pantzartzis, certify and state that:

1. I am the President of **Leap Frog Telecom, L.L.C. d/b/a Voce Telecom** ("Voce") and, acting as an agent of the company, I have personal knowledge of Voce's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Voce's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



\_\_\_\_\_  
Dimitris Pantzartzis, President

2-24-2009

\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**Leap Frog Telecom, L.L.C. d/b/a Voce Telecom**

**Statement of CPNI Procedures and Compliance**

Leap Frog Telecom, L.L.C. d/b/a Voce Telecom ("Voce" or "Company") provides wholesale telecommunications services to other carriers and as such does not have any subscribed service relationship with any business or residential customers. The Company does not obtain, retain or use CPNI for any purpose. Although the Company does have call detail records, it does not have any information regarding the calling or called party, such information is not used for marketing purposes. Voce is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. Company employees are prohibited from disclosing such information and the Company provides for disciplinary action for such violations, up to and including termination of employment.

Moreover, Voce does not market its services to end users in any fashion. Its marketing efforts are directed towards resellers and other carriers and such efforts do not include the use of CPNI or call detail records.

The Company does not disclose call record information over the telephone.

The Company does not disclose detail records on-line.

The Company does not have any retail locations and therefore does not disclose call detail records in-store.

Should Voce expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Company has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2008.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.